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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

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In the matter of:

The Michigan Public Service Commission

File No. NSD-L-01-36

Petition for Delegation of Additional Authority
Pertaining to NXX Code Conservation Measures,

and

Number Resource Optimization

CC Docket Nos. 96-98
and 99-200

OAKLAND COUNTY'S COMMENTS IN SUPPORT OF THE
MICHIGAN PUBLIC SERVICE COMMISSION
PETITION FOR ADDITIONAL DELEGATED AUTHORITY
TO IMPLEMENT NUMBER CONSERVATION MEASURES

Oakland County is interested in these proceedings because the NPA used by most Oakland County residents (248) is currently the subject of a request for area code relief pending before the Michigan Public Service Commission ("MPSC"). Oakland County has submitted public comments to the MPSC concerning the area code relief request, and has been working with the MPSC in an effort to address this problem and its potential impact on Oakland County residents. Many of the County's neighbors are also impacted by these issues, as requests for area code relief are pending in the following NPAs: 313, 734, 810, and 517.

Since the MPSC was given authority by the Michigan legislature to address area code relief issues in July of 2000, the MPSC has taken the steps that it presently can to optimize numbering resources. As indicated in its Petition, amongst other things, the Commission has begun number reclamation efforts. In

view of the numbering resource issues present in the State of Michigan, as evidenced by the number of area code relief requests presently pending, it is readily apparent that the MPSC needs additional tools to address this problem. Oakland County agrees that our Commission needs to be given these tools so that our County's residents, and the residents of surrounding communities are not continually inconvenienced by the unnecessary implementation of further area codes, when resources in existing NPAs have not been fully utilized.

On December 1, 1993, Oakland County residents were subjected to area code relief, when most County residents were changed from the 313 NPA to the 810 NPA. County residents were again subjected to area code relief in 1997, when most Oakland County residents were transitioned from the 810 area code to the 248 area code. In 2000, just three years after the implementation of the 248 NPA, the request for area code relief referenced above was submitted. Unless significant steps are taken to address this problem, Oakland County residents are likely to suffer the disruption of having yet another area code implemented in the near future, and it also appears likely that area code relief will be sought again in the year 2004. Under the current proposal for area code relief in the 248 NPA, an all services overlay will be implemented. Thus, Oakland County businesses, and homes with more than one line will be faced with the potential of having different area codes for the same business or household if new lines are ordered. Moreover, all County residents will be required to use 10 digit dialing.

Oakland County's research on the 248 NPA indicates that less than half of the phone numbers currently assigned to service providers have actually been

put into use. There are approximately 8 million phone numbers that could be used in the in the 248 NPA. The County has approximately 1.2 million residents. Thus, if number usage had been optimized in the 248 NPA, there would be more than six phone numbers available for every man, woman, and child residing in the County. This will grow to more than 13 numbers for every man, woman and child in the County if area code relief is granted. This certainly indicates that numbering resources in the 248 NPA have been wasted. All of the causes of number exhaustion, including rate center consolidation, must be addressed. The MPSC is currently evaluating rate center consolidation in connection with the request for area code relief for the 248 NPA. Every effort should be made to optimize utilization of existing numbering resources, and regulators at the state level are often in the best position to evaluate and address these issues.

It has been repeatedly demonstrated that number pooling can significantly extend the date for exhaustion of area codes. In the Chicago area, implementation of number pooling extended the 847 NPA for a period of approximately two (2) years. In the Matter of: *Numbering Resource Optimization*, CC Docket No. 99-200 (rel. March 31, 2000) at ¶ 123.

Similarly, it is clear that the MPSC's request to obtain delegated authority for sequential numbering to minimize one-thousand number block contamination can only serve to extend the exhaust date of NPAs in Michigan. The same holds true for the MPSC's request to maintain NXX code rationing, as is currently occurring in the 248 NPA.

Based upon our review of the MPSC's Petition, it is clear that the MPSC is in need of the additional delegated authority to address the numbering resource

issues that are present in many NPAs in the State of Michigan. Moreover, the MPSC has clearly demonstrated that it meets or exceeds the FCC's criteria for obtaining this delegated authority. For these reasons, Oakland County is fully supportive of the MPSC's Petition for Additional Delegated Authority to Implement Number Conservation Measures, and requests that such relief be granted.

Respectfully submitted,

OAKLAND COUNTY CORPORATION COUNSEL

A handwritten signature in black ink, appearing to read 'Keith J. Lermينياux', written in a cursive style.

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